

In the matter of the 1998 bennial Regulatory Review--
Amendment of Part 97 of the Commission's Amateur Service
Rules, FCC WT Docket 98-143.

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My comments on the above cited docket item are as
follows:

To begin, it is obvious the novice license is not the preferred route of entry into the amateur radio service, serves little purpose, and should be eliminated. Following the elimination of the novice class, the name of the technician license should be changed to basic amateur radio license. I believe basic license more accurately reflects its role and the purpose for which I believe most of those who hold technician licenses do so, to be able to perform the basic function of transmitting on Amateur Radio frequencies. And their VHF privileges do allow them to engage in all the activities that are basic to amateur radio--public service, DX, traffic handling etc.

I also believe the name basic license reflects the fact that it is the no-code technicians who are truly at the bottom the amateur radio heap. That does not mean I want to denigrate the technicians. It was a technician who got me back into amateur radio. He is a dedicated ESDA, Emergency Services and Disaster Agency, member and SKYWARN spotter, and both our amateur radio and our community are lucky to have him in their service. However, it is much more difficult to pass even a five wpm code test than a written amateur exam. Don't I know it! That is particularly true of today's exams. In fact, in most case, the written exam is a mere formality. After all, one can buy all the questions and answers to the test, and quite legally and cheaply to boot. So, the written test is, in fact, more a test of memory--and literacy--than the understanding of electronic fundamentals and amateur radio regulations--though a young man I tested with did somehow manage to fail the novice written.

Still, in most cases, the technician test is not much more than a formality; and a technician license can be had pretty much for the asking. Again, the proceeding is not true of the novice CW exam, at least not for normal humans. And, once more, I believe it is the no-code operators--not the novice operators--who deserve to be ranked lowest in the amateur radio licensing hierarchy. Therefore, when the novice class is eliminated, the technician plus class should be renamed simply the technician class. Further, I believe novices should be automatically upgraded to technicians when their class is eliminated.

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Next, one of the things that is most appealing about Amateur Radio are its traditions as a long standing radio service. However, one of those traditions is that the service is in a constant state of flux; and that is not at all appealing.

I just returned to Amateur Radio after more than a decade of absence. I started as a novice in 1978 and returned as a technician plus this year ('98). And I am still getting used to the way things work now. If I had known it was going to change in a few months, I would not have returned to the service.

Next, as I expressed to a ham co-worker of mine, my motto is CW sucks. It took me four tries to pass the 5 wpm code test to get my novice license. But I returned as a tech PLUS, because I would not have felt comfortable operating an amateur radio station without having passed a code test. I also passed my tech plus code test on my first try, with one minute of perfect copy. So, there is hope for everyone, just wait twenty years and it will come.

Actually, I found a more effective way of learning the code, Gordon West's, WB6NOA's code tapes. And it may be that the amateur community needs to be encouraged to assist potential hams in exploring the best options available for learning CW.

The minute of perfect copy was also important to me, but that was only because I had beaten my old nemesis in our rematch according to the old rules, no asterisks on this victory. But I would gladly have accepted a license under the current test rules as well. In fact, I was more proud that I had produced good looking, usable copy, than that I had managed to snag just twenty five letters. I could tell the call sign of the station who was supposed to be sending, where the "operator" was from, and every other item of information that was sent; and I think that should be the standard for passing all code tests. I also think the testing for that is as adequate as possible, that is without implementing elaborate and possibly subjective test procedures. I do, however, think all CW tests should be fill in the blank, to insure the test was not passed by sheer luck. But reasonable spellings should be accepted.

I would also like general class privileges; but, as the now old saying goes, I want them the old fashioned way: to earn them. And, to me, that means passing a 13 WPM code test. Further, retaining the current code requirements most likely means I will never advance to Amateur Extra. I am not even sure I will ever see a general class ticket. Yet, so be it.

With regard to the need to retain CW as a requirement for all but the lowest class of license, it may be true that CW is an ancient mode. But close order drill has served no combat function in the military services for centuries; however, no has suggested military recruits should not be required to learn it. In any case, as the old saying goes "the more complicated you make the sink, the easier it is to stop up the drain." All the fancy digital modes are fine; but as STS Challenger showed us, technology can and does fail in a catastrophic fashion. It can also fail in completely unexpected ways. As the great "pager blackout of '98" showed us. That "blackout" also showed us even non-terrestrial methods of relaying communications are subject to the forces of nature and are not, therefore, wholly reliable. Networked computers and other technology can also be the subject of deliberate attack. Therefore, it may be a good idea to retain a pool of operators who are versed in and able to make use of simpler modes. Even trunked radio systems must depend upon elaborate repeater voting and other systems.

One bug may be not be able to significantly cripple a vast, complex, and redundant communications system. But the Titanic was never supposed to be the setting for several disaster films.

I also do not believe it paranoid to say that it is possible the ultimate communications emergency in the form of a nuclear attack might occur. More nations are developing nuclear weapons capability and are working on long range delivery systems. There are even nuclear weapons that might be smuggled into the U.S. Nor is the world the stable place we thought it would be after the breakup of the Soviet Union. In fact, it may even be more dangerous. And once again, the impact of the detonation of a nuclear device or devices in the U.S. cannot be fully predicted.

There is also the more prosaic reason for retaining current code requirements, and that^{is} it demonstrates a high degree of commitment and a keener appreciation of the privileges granted. I am old enough to remember the CB craze and the promise everyone thought the service had. The proceeding, of course, means I am also old enough to have witnessed the degeneration the Citizen Band radio service into its current state of nature. Is that what comes of issuing a radio license for the asking?

It may be true that the amateur service might be eliminated altogether and its spectrum might be reassigned if it fails to behave itself. But does anyone think the one megahertz assigned to Citizens Band could ever be reclaimed in our lifetime? And if that is not possible, how could it ever be possible to reclaim all the amateur spectrum. Even if the vast majority of amateurs love the precepts of radio service regulation so much they give up their avocation, there will be thousands upon thousands of amateur

transmitters out there, and they will go somewhere. Unless the government wants to go to the effort of confiscating them, and it could probably never get them all. And idiots will make use of them, as they are now making use of forty meter equipment for pirate shortwave broadcasting. Then we may end up with an electronic garbage dump spanning many megahertz. So, it is desirable to condition those who wish to be amateur radio operators to meet and set fairly high standards for themselves.

Further, with communications technology, and personal communications technology in particular, and access to that technology advancing and growing rapidly, a question of amateur radio's relevance to present and future times is raised. For one, it appears radios are going the way of cars and becoming so complex that even well equipped and gifted amateurs will not be able to build, or even service them, so how can radio amateur contribute to the state of the art? That is a valid question. However, there is probably more work to be done in the field of radio propagation and certainly with respect to digital modes of communication. And how many people in the seventies thought guys in their garages would usher in a profound evolution in computing power and its distribution? In any event, even if amateur radio cannot contribute to the state of the art directly, it may do so indirectly by giving young people, and others, training in basic electronic principles as well an opportunity to work and experiment with those principles.

Few would argue the Model T is the world's optimum mode of automotive transportation today. But thousands spend a good deal of time and money restoring and maintaining them. And I am sure a great deal can be learned by observing basic implementations of transmissions, ignition systems, etc. This comparison is not exactly in accordance with the previous example, but it was two bicycle makers who expanded upon their basic mechanical knowledge to put man in the air.

It is also true there are thousands upon thousands of cellular phones that have the ability to communicate directly with emergency agencies from the scene of an accident or disaster. That a large segment of the population can now communicate with other people around the world via the Internet and that international goodwill, or the lack thereof, can be fostered in that fashion and that it is easier to send e-mail than to track down a ham--even the e-mail has to be relayed by other means. As I write this it has even become possible to place a cell phone call to any point in the world, the Iridium system is on-line.

However, there are issues of cost. I see an Iridium phone costs three thousand dollars, hardly for the average man, municipality. They are even expensive by the standards of state government. And calls will cost several dollars a minute. Even the price of cell phones are out of range of

the poor, both people and organizations, who would have to both purchase the phone and pay for air time. Whereas, amateur radio may require only the initial investment in the two meter rig. So, amateur radio helps to even things up between rich and poor.

Also, amateur radio gives an individual something other means of communication do not: independence. It is true amateurs and their stations must be licensed and the use of amateur radio frequencies must be regulated. But so must drivers, their cars, and the roadways; yet private vehicles provide us immense mobility and personal freedom. So too does the ownership of^{an} amateur radio station and the privilege to operate it. For most, Internet service means dependence upon a service provider. A cell phone user is dependent upon the owner of the repeaters and other apparatus necessary to make his phone an effective communications tool. A regular phone user depends on the phone company etc. But a ham may own and operate equipment that allows him to communicate with his fellow hams across town or across the world and do so at his initiative and with means solely under his control, or the control of other amateurs.

And I think that is an important thing to have in a free society, because the other means may be subject to control just by pulling the plug.

Of course, it true that there may be times when it may be undesirable to have people talking willy-nilly. But liberty always involves some risk. And that is another reason to set high standards in the amateur service.

Furthermore, the widely distributed nature of the "communications network" formed by the amateur service, once again, makes it invulnerable to being disabled by an attack on some central control or ground facility. There may be some paranoia in that thought, but we all know the threat of terrorism is very real in our world today. And it is a threat that amateur service might be encouraged to specifically plan to address with government agencies.

Next, there are amateur radio operators who know how to fox hunt, that is engage in radio direction finding; and that could be a life saving service--for example it has been necessary to locate the cell phone of a woman caught in a blizzard--though I do not think amateurs were involved in that search. Having a direction finding capability also means amateurs are in position to assist regulatory, law enforcement officials, and others in their search for illegally operated transmitters.

I do not, however, think any amateurs should have the authority to cite other amateurs. Amateur radio operators should continue the self-policing of our bands through each operator's own regard for the regulations, through friendly

suggestions to errant operators, by shunning those operators whose practices are particularly poor or illegal, by documenting and reporting severe violations, and by providing citizen assistance to the FCC or other proper authority that might step into a situation. I believe to do otherwise would create an elite group of amateurs who would probably have little oversight; and since hams are people too, they might tend to abuse their power. In any event, I as I have said, our amateur service should be a free but well regulated entity; and having a bunch of official informers in its midst will contribute neither to the reality or the perception of the amateur service as a free but regulated entity.

In any case, and returning to amateur radio's value today and in the near future, it is true being a ham is not what it used to be. Gee whiz, you can do that has often turned to I can do that too. Of course, to the extent that amateur radio retains its non-commercial character, amateurs are and might learn to interact, and possibly enhance, the communications methods I have spoken of here. And there is still life in the amateur service, and I have pointed out I think it can play an important role today and in the immediate future.

Therefore, I do not believe radical restructuring or re-regulation of the amateur service is advisable at this time. Technology and circumstances are changing so rapidly it would be better to wait to see what develops before plunging whole hog into "reform" of amateur radio. Nor do I believe substantial alteration of the amateur service regulations would result in greater efficiency or less work for the Commission and its staff. Novel regulations will raise novel questions that will require endless clarification, interpretation, and judicial and quasi-judicial litigation. And with the exception of the suggestions I have made, and will make, here the amateur service and its regulations should be left in their present state.

My other suggestions are that volunteer examiners should be allowed to formulate and administer five questions that are not published. Or in the alternative, they should be allowed to select those questions from a pool of unpublished questions. That is to ensure the applicant has learned not memorized, and it places an emphasis back upon the amateur service as means of self training in the electronic and radio arts. And, quite frankly those are subjects I have not had time to bone up on. Yet again, I am happy to be^a amateur at any license class. ^

Last and again, working upon proposals to make comprehensive changes to the amateur radio service at this time would be overworking to avoid work.

Thank you for your time and the opportunity to express myself on these matters.

Signed:

Lincoln R. Starn, KAGCC

P.S. I am sorry, but my budget does not yet permit me to purchase a new printer or expensive new word processing software. And newer software does not communicate well with my old Hewlett Packard LaserJet. I doubt you have access to my older word processor, so the document on my disk is in the more common MS Works format. That account for the differences in my printed and word processed documents. I hope it has not presented a problem.